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Transaction ID 69010021

Case No. S22C-10-012 RHR



IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

JOHN PAUL MAC ISAAC,)
)
Plaintiff,)
)
v.) C.A. No. S22C-10-012 RHR
)
CABLE NEWS NETWORK, INC.,)
ADAM BENNETT SCHIFF, POLITICO)
LLC, ROBERT HUNTER BIDEN and)
BFPCC, INC.,)
)
Defendants.)

**DECLARATION OF ALISON SCHARY IN SUPPORT OF DEFENDANT
CABLE NEWS NETWORK, INC.'S OPENING BRIEF IN SUPPORT
OF ITS MOTION TO DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT**

I, Alison Schary, hereby declare as follows:

1. I am a partner at the law firm of Davis Wright Tremaine LLP, counsel for Defendant Cable News Network, Inc. ("CNN"). I make this declaration in order to annex exhibits relied upon in CNN's Motion to Dismiss Plaintiff's First Amended Complaint. I believe the statements made to be true and accurate.

2. Annexed hereto as **Exhibit 1** is a true and correct copy of an October 14, 2020 New York Post article by Emma-Jo Morris and Gabrielle Fonrouge titled "Smoking-gun email reveals how Hunter Biden introduced Ukrainian businessman to VP dad," available at <https://nypost.com/2020/10/14/email-reveals-how-hunter-biden-introduced-ukrainian-biz-man-to-dad/>.

3. Annexed hereto as **Exhibit 2** is a true and correct copy of an October 15, 2020 Washington Post article by Shane Harris, Ellen Nakashima, Greg Miller and Josh Dawsey titled “White House was warned Giuliani was target of Russian intelligence operation to feed misinformation to Trump,” available at https://www.washingtonpost.com/national-security/giuliani-biden-ukraine-russian-disinformation/2020/10/15/43158900-0ef5-11eb-b1e8-16b59b92b36d_story.html.

4. Annexed hereto as **Exhibit 3** is a true and correct copy of an October 15, 2020 NBC News article by Ken Dilanian titled “Feds examining whether alleged Hunter Biden emails are linked to a foreign intel operation,” available at <https://www.nbcnews.com/politics/national-security/feds-examining-if-alleged-hunter-biden-emails-are-linked-foreign-n1243620>.

5. Annexed hereto as **Exhibit 4** is a true and correct copy of an October 14, 2020 CNN digital article by Marshall Cohen, Zachary Cohen, Michael Warren, Evan Perez, Alex Marquardt and Mark Morales titled “US authorities investigating if recently published emails are tied to Russian disinformation effort targeting Biden,” as updated on October 16, 2020, available at https://lite.cnn.com/en/article/h_7e5fcdff7051ba1d73b135ee16f5b3b.

6. Annexed hereto as **Exhibit 5** is a true and correct copy of the transcript of the October 16, 2020 episode of The Situation Room with Wolf Blitzer containing the interview with Rep. Schiff that is the subject of Plaintiff’s claims, available at

<http://www.cnn.com/TRANSCRIPTS/2010/16/sitroom.02.html>. Exhibit 5 is a complete version of the same transcript attached as Exhibit I to the Complaint, which was missing sections of text.

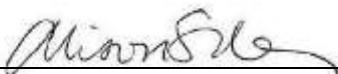
7. **Exhibit 6** is a true and correct copy of video footage of the interview with Rep. Schiff at issue in this case from the October 16, 2020 episode of The Situation Room with Wolf Blitzer. The video footage is available at <https://twitter.com/cnnsitroom/status/1317245084639891457>. Exhibit 6 was also conventionally filed with the Court.

8. Annexed hereto as **Exhibit 7** is a true and correct copy of an October 21, 2020 CNN digital article by Even Perez titled “FBI says it has ‘nothing to add’ to Ratcliffe’s claim on Russian disinformation,” available at <https://www.cnn.com/2020/10/16/politics/russian-disinformation-investigation/index.html>, which is one of the publications at issue in this lawsuit.

I declare under penalty of perjury under the laws of the State of Delaware that the foregoing is true and correct and that this declaration was executed on the date set forth below.

Dated: Washington, DC

January 30, 2023


Alison Schary